TECHNICAL REVIEW DOCUMENT for OPERATING PERMIT 000PEA228

to be issued to:

Eagle County Road & Bridge Department
Eagle County Landfill
Eagle County
Source ID 0370072

Prepared by Cathy Rhodes November, 2000

I. PURPOSE:

This document establishes the basis for decisions made regarding the Applicable Requirements, Emission Factors, Monitoring Plan and Compliance Status of Emission Units covered within the Operating Permit proposed for this site. It is designed for reference during review of the proposed permit by the EPA and during Public Comment. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Conclusions in this document are based on information provided in the original application submittal of November 6, 2000 and supplemental Title V technical information.

Any revisions made to the underlying construction permits associated with this facility in conjunction with the processing of this operating permit application have been reviewed in accordance with the requirements of Regulation No. 3, part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This operating permit incorporates and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or for an additional or revised Construction Permit.

II. Source Description:

This facility disposes of municipal solid waste. The facility is located approximately two miles north-northeast of Wolcott, Eagle County, Colorado. There are no affected states within 50 miles of the facility. The following areas are Federal Class I designated areas within 100 kilometers of the plant: Rocky Mountain National Park; Flattops National Wilderness Area; Maroon Bells-Snowmass National Wilderness Area; Mount Zirkel National Wilderness Area; and Eagle's Nest National Wilderness Area.

The Title V application reports the facility is not subject to the Accidental Release Plan provisions of 112(r)(7) of the Clean Air Act.

Facility wide emissions are as follows (tons/year):

Pollutant	<u>Actual</u>	<u>Potential</u>
Particulate Matter	13	13
PM_{10}	4	4
Volatile Organic Compounds (VOC)	12	12
Carbon Monoxide	2	2

Actual and potential emissions are based on permitted emission limits.

Prevention of Significant Deterioration and Nonattainment New Source Review

This plant is located in an area designated as attainment for all pollutants. The facility is a minor source for Prevention of Significant Deterioration purposes.

III. EMISSION SOURCES:

SUMMARY DESCRIPTION OF PROCESS

The following sources are specifically regulated under terms and conditions of the Operating Permit.

P01 – Solid Waste Landfilling

Landfill gas emissions are generated through degradation of biodegradable waste in the landfill. Fugitive particulate emissions result from solid waste disposal activities, including unpaved haul roads, refuse handling, compost operations, and wind erosion from disturbed areas and storage piles.

Applicable Requirements- Initial Approval Construction Permit 00EA0098 was issued for this facility. Applicable requirements are as follows.

- Emission Guidelines for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cc, as adopted by reference in Colorado Regulation No. 6, Part A) (Note: Gas collection and control are not currently required at this site, because NMOC emissions calculated using the Tier 2 calculation have not equaled or exceeded 50 megagrams/year. Reporting and recordkeeping requirements apply.)
- C Colorado Regulation No. 1
 - C Opacity, no off-property transport, and nuisance emission guidelines (Section II.D)
- Colorado Regulation No. 2 (Odor)
- C Initial Approval Construction Permit 00EA0098
 - C Lists fugitive particulate emission control measures

The applicant requested a revision of the following control measure:

From: Six (6) inches of soil cover or geotextile fabric as an alternative daily cover (ADC) shall be applied following the placement of each refuse lift and at the end of each day.

To: Six (6) inches of soil cover, geotextile fabric, or other appropriate cover as an alternative daily cover (ADC) shall be applied at the end of each day.

- C Limits opacity to 20 or 30 percent (Note: These limits are from Colorado Regulation No. 1, II.A.1 and 4 These limits do not apply to fugitive emissions, therefore they are not included in this operating permit)
- C Limits waste acceptance rate on daily and rolling twelve month bases (Note: The daily waste acceptance rate is removed, per the Division's Short Term Limit Policy. In addition, the applicant requested an increase in the annual rate from 102,000 tons/year to 130,000 ton/year)
- C Limits pollutant emissions on a rolling twelve month basis (the requested increase in acceptance rate results in an increase in PM and PM₁₀ emissions of 2 tons per year each)

Emission Factors- Fugitive PM emissions are estimated using AP-42 factors and equations, along with appropriate control measure efficiencies. Waste receipt information is used to determine landfill gas emissions, including CO, VOC, NMOC, and hazardous air pollutant emissions. The waste volume data is entered into the EPA? s Landfill Gas Estimation Model.

Monitoring Plan- The permittee will perform a weekly visual inspection to ensure the fugitive particulate matter minimization methods are in place and effective. The Emission Guidelines set forth specific monitoring methods.

Compliance Status- The Division believes these sources were in compliance with applicable requirements as of the date of application submittal.

IV. Emission Factors

From time to time published emission factors are changed based on new or improved data. A logical concern is what happens if the use of the new emission factor in a calculation results in a source being out of compliance with a permit limit. For this operating permit, the emission factors or emission factor equations included in the permit are considered to be fixed until changed by the permit. Factors dependent on the fuel sulfur content or heat content can not be fixed and will vary with the test results. The formula for determining the emission factors is, however, fixed. It is the responsibility of the permittee to be aware of changes in the factors, and to notify the Division in writing of impacts on the permit requirements when there is a change in factors. Upon notification, the Division will work with the permittee to address the situation.

Tech Review Summary – Eagle County Road & Bridge Department – Eagle County Landfill